

THE HONORABLE TANA LIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANDREA GLADSTONE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

AMAZON.COM SERVICES LLC,

Defendant.

NO. 2:23-CV-00491-TL

STIPULATED MOTION AND
~~PROPOSED~~ ORDER TO EXTEND
DEFENDANT'S DEADLINE TO
RESPOND TO COMPLAINT

NOTE ON MOTION CALENDAR:
AUGUST 1, 2023

Pursuant to Judge Lin's Standing Order for All Civil Cases and Local Civil Rules 7(d)(1) and 10(g), Plaintiff Andrea Gladstone and Defendant Amazon.com Services LLC ("Amazon") (collectively "the Parties"), by and through their respective attorneys, hereby move the Court to extend by fourteen (14) days the deadline for Amazon to respond to the First Amended Class Action Complaint (Dkt. 11), from August 4, 2023, to August 18, 2023.

In support of the foregoing request for relief, the Parties state as follows:

1. Plaintiff filed the original Complaint on March 31, 2023. (Dkt. 1.)
2. On April 24, 2023, the Court granted the Parties' Stipulated Notice to Extend Defendants' Deadline to Respond to Complaint by 30 days, to May 25, 2023. (Dkt. 5.)
3. Following the Parties' discussions regarding the factual allegations in the original Complaint, and in light of Plaintiff's expressed intent to amend the original Complaint, the

STIPULATED MOTION AND ~~PROPOSED~~
ORDER TO EXTEND AND SET DEADLINES
(No. 2:23-cv-00491-TL)

1 Parties filed a Stipulated Notice agreeing that Plaintiff would file any First Amended Complaint
2 by June 15, 2023, and that Amazon's deadline to respond to the operative complaint would be set
3 for August 4, 2023. (Dkt. 8.) The Court reset the deadlines pursuant to the Parties' Stipulated
4 Notice on May 19, 2023.

5 4. On June 15, 2023, Plaintiff filed the First Amended Complaint ("FAC"). (Dkt.
6 No. 11.)

7 5. The Parties met and conferred to discuss, among other things, the factual
8 allegations in the FAC on August 1, 2023. The Parties agreed to further extend Amazon's
9 deadline to respond to the FAC by two weeks to allow the Parties time to continue those
10 discussions before Amazon is required to respond to the FAC.

11 6. Good cause exists for this brief extension because it serves the interest of judicial
12 efficiency and preserves the Parties' resources. Because the Parties' discussions may possibly
13 result in, among other things, the Plaintiff voluntarily dismissing the FAC or filing a Second
14 Amended Complaint with Amazon's consent, this brief extension avoids the need for motion
15 practice regarding allegations that may be further amended or dismissed in their entirety. *See,*
16 *e.g., New World Med. Inc. v. Microsurgical Tech. Inc.*, No. 2:20-CV-01621-RAJ-BAT, 2021 WL
17 366106, at *1 (W.D. Wash. Feb. 3, 2021) ("[C]ourts will seek to limit the burden on parties and
18 on itself when there is potential for an action to be dismissed in its entirety."). Neither Party will
19 be prejudiced by this brief extension of Amazon's deadline to respond and the proposed
20 extension will not cause any undue delay. If the Parties' discussions result in Plaintiff seeking
21 leave to file a Second Amended Complaint, the Parties agree to meet and confer in good faith
22 regarding any further changes to the schedule for briefing any anticipated motions to dismiss and
23 deadlines under Federal Rule of Civil Procedure 26.

24 WHEREFORE, the Parties stipulate and respectfully request the Court enter an Order
25 setting the deadline for Amazon to respond to Plaintiff's First Amended Complaint to August 18,
26 2023.

1 DATED: August 1, 2023

2 Respectfully submitted,

3 By: s/ Erin K. Earl
4 Erin K. Earl, Bar No. 49341
5 Ryan Spear, Bar No. 39974
6 Nicola C. Menaldo, Bar No. 44459
7 **PERKINS COIE LLP**
8 1201 Third Avenue, Suite 4900
9 Seattle, Washington 98101
10 Telephone: +1.206.359.8000
11 Facsimile: +1.206.359.9000
12 RyanSpear@perkinscoie.com
13 NMenaldo@perkinscoie.com

14 *Counsel for Defendant*
15 *Amazon.com Services LLC*

By: s/ Wright A. Noel
Wright A. Noel
CARSON NOEL PLLC
20 Sixth Avenue NE
Issaquah, WA 98027
Telephone: +1.425.837.4717
Wright@carsonnoel.com

Joseph I. Marchese (*pro hac vice*
forthcoming)
Max S. Roberts (*pro hac vice*
forthcoming)
BURSOR & FISHER, P.A.
888 Seventh Avenue
New York, NY 10019
Telephone: (646) 837-7150
Facsimile: (212) 989-9163
JMarchese@bursor.com
MRoberts@bursor.com

Neal J. Deckant (*pro hac vice*
forthcoming)
BURSOR & FISHER, P.A.
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
NDeckant@bursor.com

16 *Counsel for Plaintiff*
17 *Andrea Gladstone*

~~PROPOSED~~ ORDER

IT IS SO ORDERED.

Dated this 2nd day of August, 2023.



Tana Lin
United States District Judge

Presented by:

By: s/ Erin K. Earl
Erin K. Earl, Bar No. 49341
Ryan Spear, Bar No. 39974
Nicola C. Menaldo, Bar No. 44459
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101
Telephone: +1.206.359.8000
Facsimile: +1.206.359.9000
RyanSpear@perkinscoie.com
NMenaldo@perkinscoie.com

Counsel for Defendant
Amazon.com Services LLC

By: s/ Wright A. Noel
Wright A. Noel
CARSON NOEL PLLC
20 Sixth Avenue NE
Issaquah, WA 98027
Telephone: +1.425.837.4717
Wright@carsonnoel.com

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New York, NY 10019
Telephone: (646) 837-7150
Facsimile: (212) 989-9163
JMarchese@bursor.com
MRoberts@bursor.com

Neal J. Deckant (*pro hac vice*
forthcoming)
BURSOR & FISHER, P.A.
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
NDeckant@bursor.com

Counsel for Plaintiff
Andrea Gladstone